MORRISON TENENBAUM

MORRISON-TENENBAUM PLLC, ATTORNEYS-AT-LAW M-T-LAW.COM 87 WALKER STREET 2ND FLOOR NEW YORK NY 10013 PHONE 212.620.0938 FAX 646.998.1972

May 31, 2022

VIA ECF

The Honorable Valerie E. Caproni United States District Court Southern District of New York 40 Foley Square, Room 240 New York, NY 10007

> Re: SingularDTV GmbH v. Doe

> > 1:21-cv-6000

Dear Judge Caproni,

As discussed in our previous status letter, Plaintiff, SingularDTV GmbH, through its counsel Morrison Tenenbaum PLLC, has served its Motion to Compel Binance Holdings Limited to comply with our earlier-served subpoena, so ordered by Your Honor in the May 9 Memo Endorsement (Docket No. 47). That order established a May 30, 2022, deadline for Binance Holdings Limited to respond to Plaintiff's Motion to Compel.

Counsel for Binance Holdings Limited and I are engaged in discussions that may moot the motion, and we jointly and respectfully request a brief extension of the briefing deadlines in Your Honor's order to June 6, 2022, for the response and June 13, 2022, for the reply. This will give the parties some room to reach agreement.

Respectfully Submitted,

Morrison Tenenbaum PLLC Counsel for Plaintiff